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*Attorneys for Defendant and
Counterclaimant Skyryse, Inc.*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MOOG INC.,
Plaintiff,
v
SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and
DOES NOS. 1-50,
Defendants.

SKYRYSE, INC.,
Counterclaimant,
v
MOOG INC.,
Counterclaim-Defendant.

CASE NO. 2:22-cv-09094-GW-
MAR

**DECLARATION OF VINCENT
SOCCI IN SUPPORT OF
SKYRYSE'S MOTION TO
OVERRULE MOOG'S
OBJECTION TO SKYRYSE'S
DISCLOSURE OF
CONFIDENTIAL
INFORMATION TO VINCENT
SOCCI**

Discovery Cut-Off: April 12, 2024
Pre-Trial Conference: August 12,
2024; 8:30 a.m.
Trial: August 27, 2024

Hearing: June 28, 2023
Time: 8:30 a.m.
Judge: Hon. Margo A. Rocconi
Location: Courtroom 790, 7th Floor

1 I, Vincent Socci, hereby declare and state as follows:

2 1. I am more than eighteen years of age and a citizen of the United States,
3 currently residing in Florida.

4 2. I have been retained by counsel for Skyrise, Inc. in connection with the
5 above-captioned matter.

6 3. I have personal knowledge of the facts and opinions set forth herein.

7 4. Attached hereto as Exhibit A is a true and correct copy of my CV, which
8 I provided to Skyrise for the purposes of my engagement in this action.

9 5. I am an electrical engineer by education with over thirty years of tech-
10 nical, management, and leadership experience in the aviation and aerospace indus-
11 tries.

12 6. Attached hereto as Exhibit B is a true and correct copy of my LinkedIn
13 profile, which is publicly available.

14 7. I am currently the Chief Technical Officer of On Target Motion, of
15 which I am also the founder. My role consists of all business and technical leadership
16 for the engineering services and consulting business. I also perform the engineering
17 services required for all business, with the support of other On Target Motion em-
18 ployees and contractors.

19 8. On Target Motion is not a competitor to Moog or to Skyrise. Through
20 On Target Motion, and the legacy branding of On Target Technology Development,
21 I have done work for many leading aviation companies, including Saab, Sensis,
22 Northrop Grumman, Thales, Surescan, AAM, Crane Aerospace, Kearfott, and oth-
23 ers. I am routinely entrusted with confidential information from these companies as
24 part of my contract work for them.

25 9. I do not have decision-making authority through On Target Motion for
26 any company on which I consult, including any competitor of Moog.

27 10. Attached hereto as Exhibit C is a true and correct copy of my Agree-
28 ment To Be Bound By Protective Order, which I have signed.

1 11. Through On Target Motion, I did contract work for Moog approxi-
2 mately 15 years ago. This included providing engineering services for control elec-
3 tronics and motor drive systems.

4 12. I remember the general programs I worked on for Moog, but do not
5 recall the specific technical details.

6 13. I am not aware of any ongoing confidentiality obligations I owe to
7 Moog as a result of the contract work I did for them fifteen years ago.

8 14. To the best of my knowledge and memory, I have not retained and do
9 not have possession of any of the Moog information, confidential or otherwise, that
10 I may have had or worked on at the time of my contract work for Moog.

11 15. If I encounter or recall any confidential information that I obtained
12 through the contract work I did for Moog, I will keep such information confidential
13 and will not share it with Skyrise or use it for any purpose in connection with this
14 litigation or otherwise.

15 16. The opinions I provide in this case will be based on my general exper-
16 tise in the field, information provided to me through the discovery process in this
17 case, and/or my independent investigation as part of my work for this case and will
18 in no way be based on any contract work I may have done for Moog.

19 I declare under penalty of perjury that the foregoing is true and correct and
20 that this declaration was executed on May 25, 2023 in Rockledge, Florida.

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24 
Vincent Socci